REMARKS/ARGUMENTS:

Claims 5, 7-8, 13, 15, 18 and 21-34 are pending in this application. In the final Office Action dated June 16, 2006, the Examiner asserted Moran (US 2003/0161193), Lien (US 5,386,567), Deng (US 2005/0250536), Leaming (US 6,752,321); Wright (US 6,754,725), and ordinary skill (as evidenced by Papa, Jeffries and Chen) in rejecting the claims.

Claims 5 and 15 are independent, and the amended subject matter there draws support from paras 0019 and 0035. Added claims draw support from paras 0028 and 0033 (claims 21 and 33); 0019 (claims 25 and 34); para 0020 (claims 22-24 and 29-31); para 0031 (claims 26-28); and para 0026 (claim 32). No new matter is added.

Summary of Examiner Interview:

The undersigned engaged in a teleconference with Examiner Matthew Spittle and Supervising Examiner Mark Rinehart on August 2, 2006. The undersigned asserted that since the LED of Leaming (Figure 2) indicated that the smart card could be removed from the reader but provided no information as to whether the reader itself could be removed, the smart card and reader could not be combined to read on the claimed portable storage device due to the claim 5 element "an indicator for indicating...that said portable storage device may be safely removed from a host device to which it is coupled" (similar language in claim 15). Jeffries was then discussed, specifically col. 5 lines 1-6 where it is disclosed that the LED 28 indicates to a user that the carrier 14 may be physically disconnected from the bay. A distinction was discussed in that Fig. 1 of Jeffries illustrates a hard drive 12 within the carrier 14, and it was unclear during the teleconference if Jeffries disclosed whether the drive 12 was normally removable from the carrier 14 in view of the "intrinsic" element of the claims, which the undersigned noted was defined in the written description at para [0035] as "not normally removable". It was discussed, without resolution, whether amending the claims to more particularly recite meaning of the term "intrinsic" would overcome the rejection.

Remarks:

None of the cited references describe or suggest the specific elements of claims 5 or 15. Taking claim 5 as exemplary, it now recites in relevant part:

> A portable ~~storage~~ flash memory device comprising:
> a pocket-sized body;
> an intrinsic computer readable storage medium within said body, said storage medium not normally removable from said body;
> a connector...;
> a manual actuator...; and
> an indicator...

The term "flash memory device" is repeated in the body of the claim and is therefore an element of claim 5.

The button and LEDs of Moran (para 0024) are on a user interface from which the flash memory 18 is normally removable.

The adapter removal button 12 of Lien is located on a computer housing 1 (col 3 lines 59-62), not on a normally removable flash memory device as in claim 5. Lien is not seen to disclose any indicator.

An LED, LCD or vibrator is disposed on an indicating module 2 of Deng, not on the storage media module 11/flash memory (paras 0053 and 0067). If Deng's storage media module is removable, it fails to meet the "not normally removable" element of claim 5; if it is not removable, it does not have a connector for removably coupling to a host device as in claim 5.

The LED of Leaming is on the reader, not on the smart card that is inserted into the reader in each embodiment detailed in the Summary of Examiner Interview above.

The SCSI drive 12 of Jeffries is disposed in a carrier 14 that has a button 26 and LED 28. Jeffries discloses that the drive 12 spins up (col 5 line 46) and down (col. 6 line 20), and it is therefore not a flash memory device. Jeffries states that its teachings may be extended to any type of storage devices that lend themselves to a redundant array (col. 6 lines 27-28 and 37). A

flash memory having a pocket-sized body would not be recognized by one skilled in the art as appropriate for a redundant array, due at least to the limited storage capacity inherent in the pocket size and due at least to a limitation of flash memory not being present in magnetic-type drives such as Jeffries' spinning discs. It is known in the art that flash memory is subject to an erasure cycle limit due to its FETs that store data. Individual memory units of flash memory may be erased/overwritten a finite number of times before failure. See for example the background sections of US Patent Nos. 5,956,473 and 6,016,275 for further description of erasure cycles and as demonstration of knowledge in the art of this inherent flash memory limitation. One of ordinary skill would not modify Jeffries to replace the SCSI carrier and drive with a pocket-sized flash memory device due to the above considerations of storage capacity and erasure cycle.

The LED of Papa is on the swappable unit 92A to which adapter cards 154-158 may be inserted. The adapter cards are for connecting a CD-ROM, hard disk, or tape drive (col. 5 lines 22-27 and 46-52). Thus the memory devices of Papa are neither flash memory nor do they have an indicator or an actuator.

Wright is cited for subject matter unrelated to an indicator and actuator, and is not characterized in the final Office Action as teaching subject matter relevant to the claim elements discussed herein.

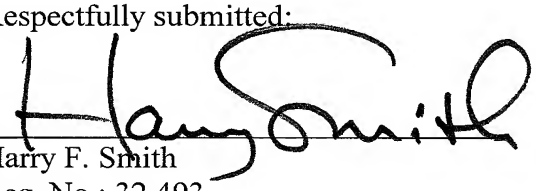
Chen describes Jeffries as prior art at cols 1-2, and differs from Jeffries in that the memory 18 may be flash, and that instead of the Jeffries drive/carrier arrangement, distinct switch modules 10, 30 are coupled to an agent module 100 through a backplane 200. The switch modules include an LED 19 and release button 16. However, the switch modules couple with the agent module in a hierarchical computer system (col. 2 lines 33-41), which necessarily precludes the operating system (e.g., run by the CPU 101) of the *agent* module from recognizing the flash memory of a *switch* module as an additional local memory as in claim 5; only the operating system (e.g., run by the CPU 11) of the *switch* module 10 is seen capable of recognizing that flash memory 18 as local storage. The operating system of the agent module recognizes the switch modules as other computer systems in a hierarchical relation with itself. Modifying

Chen so as to remove the hierarchical nature of the relation between modules 100, 10, 30 would undermine its principle of operation, as evidence by Chen's characterization of Jeffries itself at Chen's col. 2 lines 33-41.

The above applies mutatis mutandis to independent claim 15.

The Applicant believes that the independent claims presented herein patentably distinguish over the multiple references cited, and request they be passed to allowance without further delay. The undersigned representative welcomes the opportunity to resolve any matters that may remain, formal or otherwise, via teleconference at the Examiner's discretion.

Respectfully submitted:



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